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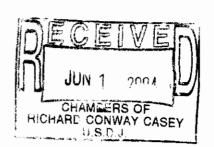
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Lawrence S. Robbins

June 11, 2004

## By Express Delivery

The Honerable Richard Conway Casey United States District Judge United States Court House Southern District of New York 500 Pearl Street Room 1350 New York, New York 10007-1312



Re: In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 Ashton v. Al Qaida Islamic Army, No. 02-CV-6977

Barrera v. Al Qaeda Islamic Army, No. 03-CV-7036 Burnett v. Al Baraka Inv. & Dev. Corp., No. 03-CV-5738 Burnett v. Al Baraka Inv. & Dev. Corp, No. 03-CV-9849 Federal Insurance Co. v. Al Qaida, No. 03-CV-6978 Salvo v. Al Qaeda Islamic Army, No. 03-CV-5071

Dear Judge Casey.

This firm represents the Saudi High Commission, a defendant in the six cases referenced above that have been consolidated as part of *In re Terrorist Attacks on September 11, 2001*, 03-MDL-1570. The Saudi High Commission, an agency of the Kingdom of Saudi Arabia, has been served in accordance with the requirements of the Foreign Sovereign Immunities Act, 28 U.S.C. § 1608, in two of the consolidated cases. The first such service was effected on May 8, 2004, in *Ashton v. Al Qaida*, No. 02-CV-6977. Under 28 U.S.C. § 1608(d), the Saudi High Commission has until July 7, 2004, to file an answer or other responsive pleading.

The Saudi High Commission respectfully asks the Court to waive its requirement of a pre-motion conference and to grant permission to file, on or before July 7, 2004, a single motion to dismiss all of the claims against it in each of the consolidated complaints.

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We also request that the plaintiffs' oppositions to the Saudi High Commission motion be consolidated into one brief in opposition. The allegations in the complaints relating to the Saudi High Commission are virtually identical, and the few differences among the complaints are not relevant to the threshold defenses of immunity from suit under the Foreign Sovereign Immunities Act and lack of personal jurisdiction, which will constitute the primary arguments in the Saudi High Commission's motion. Finally, Your Honor has granted similar requests by Prince Naif bin Abdulaziz Al Saud on March 9, 2004 (MDL Docket No. 25), and by Prince Salman bin Abdulaziz Al Saud on May 7, 2004 (MDL Docket No. 145).

Very truly yours,

Lawrence S. Robbins

cc: All counsel (by electronic mail)

Jane 15,2004

#### **Endorsement:**

Upon application of counsel for the Saudi High Commission, it is hereby ORDERED that the Saudi High Commission will file, on or before July 7, 2004, a single motion to dismiss all of the claims against it in the complaints consolidated in this multi-district litigation; and it is further ORDERED that the plaintiffs will file one consolidated opposition to the motion to dismiss.

Signed:

The Honorable Richard Conway Casey United States District Judge